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JULIE A. RICHARDS, CLERK  
US DISTRICT COURT, EDNC

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

----- DIVISION

ROGER S. BATTLE )  
----- )  
----- )

(Enter above the full name  
of the Plaintiff[s] in this  
action).

vs.

EAST CAROLINA UNIVERSITY  
JACKIE SMITH )  
----- )  
----- )

(Enter above the full name of  
**ALL** Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of **all** the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

Case No. 4:12-CV-230-F  
(To be assigned  
by the Clerk of  
District Court)

COMPLAINT

1. Plaintiff resides at 1104 W 5TH STREET CARRVILLE  
NC 27834  
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2. Defendant(s) name(s): EAST CAROLINA UNIVERSITY  
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Location of principal office(s) of the named defendant(s):

210 E. 1<sup>st</sup> ST  
GREENVILLE NC 27868

Nature of defendant(s) business: HOUSEKEEPING APT

Approximate number of individuals employed by defendant:

2010R 300

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) \_\_\_\_\_ Failure to employ me.
- (B) ☒ Termination of my employment.
- (C) \_\_\_\_\_ Failure to promote me.
- (D) ☒ Other acts as specified below:

RETALIATION AND SEXUAL HARASSMENT

5. Plaintiff is:

(A) \_\_\_\_\_ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were \_\_\_\_\_.

Employment was terminated because:

(1) ☒ plaintiff was discharged.

(2) \_\_\_\_\_ plaintiff was laid off.

(3) \_\_\_\_\_ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) ☒ my race.

(B) \_\_\_\_\_ my religion.

(C) \_\_\_\_\_ my sex.

(D) \_\_\_\_\_ my national origin.

(E) ☒ other as specified below:

RETALIATION

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

JACKIE SMITH, BLACK, FEMALE, SUPERVISOR

8. The alleged discrimination occurred on or about \_\_\_\_\_

3/29/2011

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

TERMINATED FOR THREATENING STUDENT  
WHICH WAS UNFOUNDED.

10. The alleged illegal activity took place at: \_\_\_\_\_

LECU CAMPUS DORM

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 3/29/2011. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on \_\_\_\_\_

07/03/2012

12. I seek the following relief:

(A) ☒ recovery of back pay;

(B) ☐ reinstatement to my former job;

(C) ☒ trial by jury on all issues so triable;

and any other relief as may be appropriate, including  
injunctive orders, damages, costs and attorney's fees.

10-1-2012  
Date

Roger S Battle  
Signature of Plaintiff

1104 W 5th ST  
GREENVILLE NC 27834  
(252) 752-0353  
Address and Phone Number of Plaintiff